

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ELITE CASINO EVENTS, LLC,	)	
	)	
Plaintiff,	)	Civil Action No. 2:23-cv-01281-LPL
v.	)	
	)	
ELITE CASINO EVENTS, LLC,	)	
	)	
Defendant.	)	

**DECLARATION OF DAVID G. OBERDICK**

1. I am David G. Oberdick, and I am an adult over the age of 18 and mentally competent to attest to the truth of the facts in this declaration.

2. I have personal knowledge of the matters set forth herein. I make this declaration as the principal attorney representing Elite Casino Events, LLC ("Plaintiff") in the above-captioned matter.

3. Defendant, Elite Casino Events, LLC (a Texas limited liability company), is neither an infant or an incompetent person, nor in the military service of the United States;

4. The default of the Defendant Elite Casino Events, LLC, has been entered for its failure to appear in this action;

5. The amounts detailed below as damages, legal fees and costs are justly due and owing and that no part thereof has been paid.

6. Based upon information received from Plaintiff, and the Declaration of Dawn Takacs, the principal amount of actual damage caused by Defendant to the Plaintiff is \$10,039.11.

7. Plaintiff is also entitled to legal fees and costs. As of November 20, 2023, Plaintiff has incurred \$30,335 in legal fees and \$2,047.72 in costs. These totals includes fees and costs incurred and invoices by my firm, Meyer, Unkovic & Scott LLP, in connection with its representation of Plaintiff, as well as fees and costs incurred by Cantey Hanger LLP, a law firm in Texas who assisted with attempted service on Plaintiff in Texas.

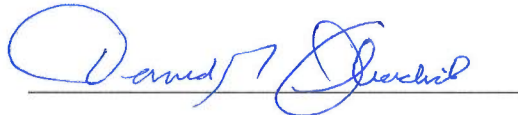
a Meyer, Unkovic & Scott LLP has billed a total of \$26,084 in fees and \$515.15 in costs through November 20, 2023. A true and correct copy of the invoice from Meyer, Unkovic & Scott LLP is attached hereto at Exhibit A. As outlined in the invoices, Meyer Unkovic & Scott, LLP, beginning in January 2023, provided legal representation to Plaintiff in connection with efforts to address Defendant's trademark infringement and resulting harm to Plaintiff (as outlined more fully in the Complaint in this matter). This assistance, included the drafting and sending of cease and desist letters to Defendant, reviewing responsive communications from legal counsel for Defendant, preparing and sending takedown notices to social media platforms on which Defendant is and/or was using Plaintiff's mark, and drafting/preparing the Complaint and other pleadings in this matter, as well as considerable time and fees/costs were incurred in attempting to serve Defendant.

b. Cantey Hanger LLP has billed a total of \$4,251 in fees and \$274.22 in costs. A true and correct copy of the invoices from Cantey Hanger LLP are attached hereto at Exhibit B. Cantey Hanger LLP services related to attempted service of process on Defendant in Texas. In this respect, Cantey Hanger retained a private server processor, R.W. Russell, d/b/a Reichling Associates to attempt service, with a resulting invoice totaling \$1,258.35. A true and correct copy of the invoice from the private service processor is attached hereto at Exhibit C.

8. The fees and costs involved in this case are reasonable and of the amount to be expected in this type of litigation given the facts.

9. Defendant currently operates a website at the domain name www.elitecasinoevent.com. A true and correct copy of the hosting and registrar information for this domain name is attached hereto at Exhibit D. For this domain name, the Registrar is GoDaddy.com, LLC and the Registrant Organization is Domains By Proxy, LLC.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and is executed this 27th day of November, 2023.

A handwritten signature in blue ink, appearing to read "David G. Oberdick", is written over a horizontal line.

David G. Oberdick

# Exhibit A



MEYER UNKOVIC SCOTT  
ATTORNEYS AT LAW

November 21, 2023

Elite Casino Events, LLC  
Attn: Dawn Takacs, President  
606 Liberty Avenue, Suite 208  
Pittsburgh, PA 15222

Invoice: 112123DGO  
Client: 284990  
Billing Attorney: DGO

INVOICE SUMMARY

For Professional Services Rendered Through: November 20, 2023

Matter #	Description	Services	Disbursements	Total
105	23-1505 Elite Casino Events, LLC Trademark Infringement litigation	26,084.00	515.15	26,599.15
TOTAL THIS INVOICE				\$26,599.15

Client: 284990  
Matter: 105

November 21, 2023  
Invoice: 111523DGO

Date	Tkpr	Description	Hours
02/22/2023	DGO	Email to client re outline of strategy on countering confusion created by Texas mark; review posts and corporate history of Texas entity re same	0.50
02/26/2023	DGO	Draft letter to Texas company re trademark infringement; review docs re same	0.60
02/27/2023	DGO	Revise notice of infringement letter	0.20
02/28/2023	DGO	Revise cease and desist letter	0.30
03/01/2023	DGO	Revise TM cease and desist letter; emails/call with client re same and strategy for enforcing mark	0.50
05/18/2023	DGO	Call with client re notice letter to Texas company	0.20
06/02/2023	DGO	Revise letter re notice of trademark infringement; emails with client re same	1.20
06/19/2023	DGO	Call with client re status of demand letter sent to Texas company; draft second demand letter	0.60
06/21/2023	DGO	Review TM infringement notice letter to Texas company; emails/calls with client re same	1.10
06/23/2023	DGO	Emails/call with JRW re drafting of complaint and cease and desist letter	0.40
06/23/2023	JRW	Reviewed Trademark Infringement materials and internal conference regarding the complaint.	0.60
06/24/2023	DGO	Review email from Texas counsel; emails with client re same	0.20
06/27/2023	DGO	Emails with client and JRW re cease and desist letter to Florida company; emails/call with client re same, response to Texas company email and draft complaint; research re personal jurisdiction in PA and emails with JRW re same	1.10
06/27/2023	JRW	Drafting of the Cease and Desist and Trademark Infringement Complaint; Research regarding requirements for an interactive website to meet the requirements of jurisdiction.	2.30
06/28/2023	DGO	Review email and research from JRW re PA jurisdiction for TM infringement claim; review research; emails with client re same	0.40
06/28/2023	JRW	Reviewed Elite Casino and Events LLC website and social media pages for all intellectual property violations.	0.20
06/28/2023	JRW	Drafted Trademark Infringement Complaint.	2.00
07/06/2023	DGO	Review/revise draft complaint against Texas company; emails/call with JRW re same; emails with client re same	1.40
07/07/2023	DGO	Revise complaint; emails with client re same; review background docs re same	0.60
07/09/2023	DGO	Revise complaint; emails with client and JRW re same; emails with client re dilution inquiry	0.40
07/10/2023	DGO	Revise complaint; emails/discussions with JRW re same; emails with client re same	0.80
07/10/2023	JRW	Reviewed and revised Complaint. Internal conference about needed information.	1.70
07/11/2023	DGO	Revise complaint; emails with client re same; emails/discussion with JRW re same	0.40
07/11/2023	JRW	Reviewed and revised complaint. Internal conference regarding the edits.	0.20
07/12/2023	DGO	Emails with client re questions on draft complaint	0.20
07/12/2023	JRW	Reviewed and revised complaint.	0.20
07/13/2023	DGO	Review/revise complaint; emails/discussion with JRW re same; emails with client re same	0.60
07/13/2023	JRW	Reviewed and revised complaint.	1.00

Client: 284990  
Matter: 105

November 21, 2023  
Invoice: 111523DGO

Date	Tkpr	Description	Hours
07/14/2023	DGO	Emails/call with client re finalization of complaint, service of same and third party notices; coordinate filing and exhibits	0.70
07/17/2023	DGO	Emails with counsel and client re filed application; prepare and submit takedown notice to Facebook; review possible notice to other social media and emails with client re same	0.50
07/19/2023	DGO	Emails with client status of enforcement actions against ECE TX and related questions	0.20
07/20/2023	DGO	Emails/discussion with JRW re notice letter and take down notices; review draft letter from client	0.20
07/20/2023	JRW	Drafted Trademark Infringement Notice Letter to NACPO Board and Membership. Researched the YouTube and Facebook Trademark Infringement reporting mechanisms.	1.70
07/23/2023	DGO	Revise cease and desist letter to Board; email to JRW re same	0.40
07/24/2023	DGO	Emails/call with client re cease and desist letter to Board and take down notices	0.30
07/24/2023	JRW	Edited letter for cease and desist.	0.50
07/25/2023	DGO	Emails/discussion with JRW re take down notices; review responses re same and emails/discussions with JRW	0.50
07/25/2023	JRW	Filed take down notices.	2.80
07/26/2023	DGO	Review social media responses to take down requests re ECE TX; emails with JRW re same	0.40
07/26/2023	JRW	Responded to take down request follow-ups.	0.60
07/28/2023	JRW	Reviewed social media takedowns.	0.30
08/01/2023	DGO	Draft and send response to Instagram declination of take down notice	0.20
08/07/2023	JRW	Status update regarding social media takedowns.	0.70
08/08/2023	DGO	Review email from ECE TX counsel; emails with client re same and status of take down notices	0.20
08/09/2023	DGO	Emails/call with D. Takacs re email from Texas counsel, proposed response to same and status of social media takedowns; email to JRW re takedowns	0.30
08/10/2023	DGO	Emails/discussion with JRW re additional takedown requests	0.20
08/16/2023	DGO	Emails with JRW re takedown request to ECE Texas; review FB response	0.20
08/16/2023	JRW	Filed Facebook Trademark Infringement Takedown Requests against Elite Casino Event Texas and Elite Casino Events DFW.	1.00
08/23/2023	DGO	Emails/discussion with JRW re service of complaint at other business addresses; review same	0.20
08/23/2023	JRW	Address review for service of complaint.	0.30
09/13/2023	DGO	Email to Texas Meritas firm re coordination on service of complaint	0.20
09/15/2023	DGO	Emails with Meritas counsel and client re service of complaint in Texas	0.10
09/20/2023	DGO	Emails with Texas counsel and client re service info and coordination	0.30
09/20/2023	JRW	Reviewed address for service of the Complaint.	0.20
09/21/2023	DGO	Emails with client and Texas counsel re service of process	0.20
09/22/2023	DGO	Emails with Texas counsel and client re service in Texas	0.10
09/26/2023	DGO	Emails/call with client re service of complaint; emails with Texas counsel re same	0.20

Client: 284990  
Matter: 105

November 21, 2023  
Invoice: 111523DGO

Date	Tkpr	Description	Hours
09/27/2023	DGO	Emails with JRW re prep of motion for substitute service; emails with client re same and possible termination of ECE TX business license; emails with Texas counsel re service status; emails with client and JRW re takedown of FB page for other company	0.90
09/27/2023	JRW	Reviewed Elite Casino Events Facebook (not our client's) page for intellectual property violations.	0.30
09/28/2023	DGO	Review/revise motion for substitute service; emails/call with JRW re same; emails/call with Texas counsel re status of service	1.70
09/28/2023	JRW	Reviewed and revised Motion for Alternative Service.	3.90
09/29/2023	DGO	Emails with Texas counsel and client re status of service efforts	0.30
09/29/2023	JRW	Reviewed and revised Motion for Alternative Service. Prepared exhibits for filing.	0.70
10/02/2023	DGO	Emails with Texas counsel and client re service of complaint	0.10
10/03/2023	DGO	Emails with client and Texas counsel re service of complaint; emails with client re further inquiries from ECE TX customers and vendors; emails with JRW re takedown notice and review of same	0.40
10/03/2023	JRW	Drafted Elite Casino Events Facebook page takedown notice against "Elite Casino Events".	0.30
10/04/2023	DGO	Draft service letter; emails/discussion with JRW re same; emails with client re continued instances of confusion; email to ECE TX re service	0.60
10/04/2023	JRW	Prepared Complaint and Summons for Service through the approved Alternative Means.	0.90
10/04/2023	JRW	Submitted Facebook trademark infringement complaint against Elite Casino Events ( <a href="https://www.facebook.com/elitecasinoevent">https://www.facebook.com/elitecasinoevent</a> ).	0.30
10/05/2023	DGO	Emails with client and JRW re service of complaint and summons, Facebook takedown request and continued confusion	0.40
10/05/2023	JRW	Updated letter for mailing. Drafted Affidavit pertaining to the Motion for Alternative Service.	1.10
10/06/2023	DGO	Emails/call with client re status of service and case, including possible challenge to business license in Texas; emails with Texas counsel and JRW re affidavit of service	0.40
10/06/2023	JRW	Reviewed and revised Affidavit of Service describing our service compliance with the approved alternative methods of service.	0.40
10/06/2023	JRW	Submitted a renewed Facebook trademark infringement takedown request against "Elite Casino Events".	0.30
10/10/2023	DGO	Review/revise affidavit of service; emails with JRW re complaint to Texas SOS re absence of registered agent	0.30
10/10/2023	JRW	Research regarding proper complaint channels to report Elite Casino, LLC - Texas's lack of correctly registered agent.	1.50
10/10/2023	JRW	Reviewed and revised the Affidavit of Service.	0.20
10/11/2023	JRW	Reviewed revisions and compiled exhibits for the Affidavit of Service of Complaint and Summons.	0.50
10/12/2023	DGO	Review and coordinate filing of Affidavit of Service; email to defendant re same	0.30
10/16/2023	JRW	Research regarding the process of filing a complaint with ICANN.	1.00



Client: 284990  
Matter: 105

November 21, 2023  
Invoice: 111523DGO

Date	Tkpr	Description	Hours
10/25/2023	DGO	Discussion with JRW re domain name challenge and notice of default	0.20
10/26/2023	DGO	Emails with client re Motion for Default judgment, including details of injunctive relief and damages; emails/discussion with JRW re same; research re same	1.10
10/26/2023	JRW	Reviewed timeline for Default Judgment Notice.	0.20
10/30/2023	DGO	Emails/call with client process of default; review notice of default; emails/discussions with JRW re same	0.70
10/30/2023	JRW	Research regarding loss profit and trademark infringement damages. Drafted Request for Default Judgment. Drafted Motion for Default Judgment.	2.80
10/31/2023	DGO	Email re service of notice of default; emails re Texas counsel invoices and addition to damages for default judgment	0.20
10/31/2023	JRW	Readied documents for servicing the Request for Default Judgment.	0.50
11/02/2023	DGO	Emails with client re entry of default judgment and Texas fees/costs for service; emails/discussion with JRW re motion for default judgment as to damages and injunctive relief	0.40
11/02/2023	JRW	Reviewed and revised Motion for Entry of Default Judgment.	0.90
11/02/2023	JRW	Research regarding damages available under trademark law and unfair trade practices.	1.00
11/05/2023	JRW	Research regarding the factors of an injunction in a trademark case.	0.40
11/06/2023	JRW	Begun drafting Brief to support the Motion for Entry of Default Judgment and damages to be awarded.	2.00
11/07/2023	DGO	Emails/discussions with JRW re brief in support of motion for default judgment; emails with client re continuing confusion and ECE TX work outside of Texas	0.40
11/07/2023	JRW	Reviewed and revised supporting Brief for Motion for Entry of Default Judgment.	2.80
11/08/2023	DGO	Review draft brief in support of default damages and injunction; discuss same with JRW	0.40
11/09/2023	DGO	Review/revise brief in support of motion for default; emails/discussion with JRW re same	1.20
11/09/2023	JRW	Additional research regarding damages for actual costs incurred by client as a result of the infringement.	0.80
11/12/2023	JRW	Drafted Declarations to add as exhibits to the Motion for Default.	1.00
11/12/2023	JRW	Reviewed and revised Supporting Brief.	3.60
11/14/2023	JRW	Reviewed and revised the Brief in Support of Motion for Default.	2.40
11/15/2023	DGO	Review/revise Motion, Brief and Declarations; emails/discussion with JRW re same	1.40
11/15/2023	JRW	Communication about compiling attorney's fees and costs to attach as an exhibit for damages. Reviewed and revised declarations.	1.20
11/17/2023	JRW	Reviewed and revised Motion for Default Judgment and Supporting Brief. Reviewed and revised declarations. Research regarding the delay of seeking infringement claims and the use of declarations instead of affidavits.	3.40
11/18/2023	DGO	Revise Brief in Support of Motion for Default and supporting declarations; emails with client and JRW re same	1.10

Client: 284990  
Matter: 105

November 21, 2023  
Invoice: 111523DGO

Date	Tkpr	Description	Hours
11/18/2023	JRW	Internal correspondence with DGO regarding edits to Brief and Motion for Default Judgment.	0.50
11/20/2023	JRW	Reviewed and revised Declarations, Motion for Default Judgment, and Supporting Brief. Conducted research regarding injunctive relief from ICANN and how to best draft proposed court orders for more immediate relief.	3.70

**TOTAL PROFESSIONAL SERVICES** **\$26,084.00**

#### SUMMARY OF PROFESSIONAL SERVICES

Timekeeper	Hours	Rate	Total
David G. Oberdick	29.80	470.00	14,006.00
Jaden Rankin-Wahlers	54.90	220.00	12,078.00
<b>TOTALS</b>	<b>84.70</b>		<b>\$26,084.00</b>

#### DISBURSEMENTS

Date	Description	Amount
06/02/2023	Postage	8.10
06/21/2023	Postage	8.34
06/21/2023	Postage	7.09
07/19/2023	Filing Fee, Credit Card Operations, 071923CPS/SO, Pymt of chgs posted through 7/17/23; Acct: 442410336766; PSC.uscourts.gov; PA Western District Court-Filing Complaint	402.00
08/23/2023	Postage	32.07
09/29/2023	Postage	10.50
10/04/2023	On Line Public research, Pacer Service Center, 5429828-Q32023, Account #5429828-Invoice #Q32023 (07/01/23 - 09/30/23)	6.80
	Lexis	40.25
	<b>TOTAL DISBURSEMENTS</b>	<b>\$515.15</b>
	<b>TOTAL THIS INVOICE</b>	<b>\$26,599.15</b>



MEYER UNKOVIC SCOTT  
ATTORNEYS AT LAW

November 21, 2023

Elite Casino Events, LLC  
Attn: Dawn Takacs, President  
606 Liberty Avenue, Suite 208  
Pittsburgh, PA 15222

Invoice: 112123DGO  
Client: 284990  
Billing Attorney: DGO

**PAYMENT INFORMATION**

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<b>BALANCE DUE THIS INVOICE</b>	<b>\$26,599.15</b>
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Please return this page with payment to:

Meyer, Unkovic & Scott LLP  
ATTN: Accounts Receivable  
535 Smithfield Street, Suite 1300  
Pittsburgh, PA 15222

**Wire Transfer Instructions:**

**Meyer, Unkovic & Scott LLP**  
Dollar Bank Account  
Receiving Bank: Dollar Bank  
Oliver Building Office  
537 Smithfield Street  
Pittsburgh, PA 15222  
412-261-8400  
ABA Routing Number: 243074385  
Account Name: Meyer, Unkovic & Scott LLP  
Checking Account Number: 0908053785  
Swift Code: DBNKUS3P

**To Pay by Credit Card:**

**Visit:**  
[www.muslaw.com/about/billing/](http://www.muslaw.com/about/billing/)

**DUE 30 DAYS FROM RECEIPT**

**WIRE FRAUD WARNING:** Never trust instructions sent via email or fax. Please always call to verify.

*Thank you!*

# Exhibit B



CANTEY HANGER LLP

ATTORNEYS

609 West 6th Street, Suite 300  
Fort Worth, Texas 76102-3655

817.877.2800  
FAX 817.877.2807  
FEI 75-0756050

October 9, 2023

Meyer, Unkovic & Scott LLP  
Attn: David G. Oberdick  
Henry W. Oliver Building  
535 Smithfield St., Suite 1300  
Pittsburg, PA 15222-2315

Invoice: 1509695  
Client: MEY19  
Matter: 117698  
Billing Attorney: LH

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## INVOICE SUMMARY

**RE: Elite Casino Events, LLC**

For professional services rendered as shown below. Unless indicated, this is an interim billing and does not include work on other matters.

Payment is due upon receipt of this invoice. Please disregard "past due" amount if you have sent your payment.

Thank you for allowing us to represent you.

Professional Fees	\$ 2,721.50
Expense Charges	<u>\$ 274.22</u>

<b>INVOICE TOTAL</b>	<b>\$ 2,995.72</b>
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Trust Funds Remaining on Account	\$ 2,000.00
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CANTEY HANGER LLP

ATTORNEYS

600 West 6th Street, Suite 500  
Fort Worth, Texas 76102-7685

FEI 75-0756050

October 9, 2023

Meyer, Unkovic & Scott LLP  
Attn: David G. Oberdick  
Henry W. Oliver Building  
535 Smithfield St., Suite 1300  
Pittsburg, PA 15222-2315

Invoice: 1509695  
Client: MEY19  
Matter: 117698  
Billing Attorney: LH

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## REMITTANCE

RE: Elite Casino Events, LLC

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**BALANCE DUE THIS INVOICE**

**\$ 2,995.72**

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**Please return this page with check payable to Cantey Hanger LLP at the above address. Other payment options below.**

**Wire Transfer Instructions:**

Account Name: Cantey Hanger Operating Account  
Account Number: 31009182  
ABA Number (Routing): 111014325  
Bank: Bank of Texas  
600 Penn Street  
Fort Worth, TX 76102  
Swift Number: BAKUS44

Please provide invoice information to assist us in determining the proper application of the wire

**Credit Card Instructions:**

Click here: [Pay Now](#)

OR

Visit our website:  
[www.canteyhanger.com/online-payments](http://www.canteyhanger.com/online-payments)  
Click: Cantey Hanger LLP Invoices

Please complete the form including invoice information provided on this statement



CANTEY HANGER LLP

ATTORNEYS

660 West 6th Street, Suite 300  
Fort Worth, Texas 76102-3685

817.877.2800  
FAX 817.877.2807  
FEI 75-0756050

October 9, 2023

Meyer, Unkovic & Scott LLP  
Attn: David G. Oberdick  
Henry W. Oliver Building  
535 Smithfield St., Suite 1300  
Pittsburg, PA 15222-2315

Invoice: 1509695  
Client: MEY19  
Matter: 117698  
Billing Attorney: LH

## INVOICE

**RE: Elite Casino Events, LLC**  
**Cause No. 2:23-cv-1281 in Western**  
**District of Pennsylvania**

### PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Amount
9/14/23	LH	Study email from D. Oberdick seeking to engage us to serve a federal court complaint on a Texas defendant; draft email in reply.	.20	95.00
9/18/23	LH	Confer with J. Sherman regarding securing process server; study email from client transmitting Complaint and Summons and advising of status of service efforts he has employed thus far; study attachments.	.30	142.50
9/18/23	JKS	Conference with Laura Hallmon regarding service of Complaint and Summons on Elite Casino Events.	.20	43.00
9/19/23	LH	Confer with J. Sherman regarding status of service.	.20	95.00
9/19/23	JKS	Emails to and from David Barberena with Falcon regarding service of Summons and Complaint on Elite's Registered Agent at 2205 N. Henderson Avenue, Dallas, TX.	.20	43.00

## CANTEY HANGER LLP

Client: MEY19  
Matter: 117698

October 9, 2023  
Invoice: 1509695

Date	Atty	Description	Hours	Amount
9/20/23	LH	Study email from client advising of an event contract for September 28, 2023 as an alternate opportunity for service; study attachment and pass along to process server; draft email to client in reply; study email from process server transmitting photo of vacant lot at the address provided for service by client; draft email to client advising of same and that we next attempt to serve the Crescent Court address; study email from client advising that it is believed that the business is operated out of Defendant's home at one point; draft email in reply; advise process server of same; study note from process server that there is no house on the vacant lot, just a driveway to where a house used to sit; confer with J. Sherman regarding possibility of running an Idicore people search on the Davidsons to try to get a better lead; draft email to client proposing same and advising of no house on the property; study email from client providing some links and a photo of franchise tax details screenshot; study email from client indicating his preference that we try the Crescent address before running an idicore search; advise process server of same.	1.00	475.00
9/20/23	JKS	Telephone call from David with Falcon Litigation regarding service address; confer with L. Hallmon regarding possible corporate headquarter service; email from David Oberdick regarding possible business operation out of Davidson home; receive email from David Oberdick regarding facebook pages for Elaine Davidson.	.50	107.50
9/21/23	LH	Study email from process server regarding his notes on attempt at the Crescent Court address; transmit same to client and seeking approval to move forward with Idicore people search at this point; study email from client approving search; confer by email with client regarding possibility of serving the Davidsons at one of the events their company is hosting.	.50	237.50
9/21/23	JKS	Email from David Moore, process server with Falcon Litigation regarding 9/21 attempt at 100 Crescent Ct. Suite 700 and t/c with Elite Casino Receptions; conference with Laura Hallmon regarding Falcon's findings; run and review IDICore reports, including different names and addresses for Elaine Clark Gibson a/k/a Elaine Davidson and Sean Davidson; compare IDICore names and mugshots with Facebook profiles provided by client to confirm identity Sean Michael Davidson and Elaine Clark Gibson a/k/a Elaine Davidson; prepare email to Laura Hallmon with information and confirming pictures from IDICore and Facebook and recommend service on Elaine Clark Gibson at DeSoto home address; verify additional Arlington address strip center; receive and upload pictures of Elaine and Sean Davidson from client; email to Falcon forwarding same.	2.40	516.00



## CANTEY HANGER LLP

Client: MEY19  
Matter: 117698

October 9, 2023  
Invoice: 1509695

Date	Atty	Description	Hours	Amount
9/22/23	LH	Study email from J. Sherman regarding results of her Idicore search; draft email to client recommending that we attempt to serve at the home owned by E. Davidson; study email from client transmitting Facebook and YouTube links about and photos of the Davidsons; forward same to process server.	.30	142.50
9/22/23	JKS	Email Falcon approving service of Elaine Davidson at her home address.	.10	21.50
9/26/23	LH	Study email from process server transmitting Affidavit of Attempts for Service; draft email to client transmitting same and advising that we need to move forward with substitute service at this point.	.30	142.50
9/26/23	JKS	Telephone call from David with Falcon regarding additional attempts at house and preparation of Affidavit of Attempts for Rule 106; Receive, review and upload Affidavit of Attempts and invoice to date; email to L. Hallmon regarding three attempts a Elaine Davidson's house and forwarding of Affidavit of Attempts for Rule 106.	.20	43.00
9/27/23	LH	Study email from client advising that he will draft the Motion to Substitute; study email from client proposing service at the casino event; study email from client seeking to confer by phone; confer by phone with D. Oberdick; confer by phone with K. Hancock; Confer by phone with K. Hancock; confer by phone with K. Hancock.	.70	332.50
9/28/23	LH	Confer with K. Hancock regarding update on process service; draft email to client advising of same; confer with K. Hancock regarding update; draft email to client advising of same.	.30	142.50
9/29/23	LH	Review updates from process server and suggestion to try tomorrow morning; draft email to client advising of same and seeking approval for attempt on service tomorrow morning; study email in reply approving same; advise process server accordingly.	.30	142.50
<b>TOTAL PROFESSIONAL HOURS/FEEES</b>			<b>7.70</b>	<b>\$ 2,721.50</b>

## SUMMARY OF PROFESSIONAL SERVICES

Attorney	Staff Level	Hours	Rate	Amount
Hallmon, Laura	Partner	4.10	475.00	1,947.50
Sherman, Julie K.	Paralegal	3.60	215.00	774.00
<b>Total</b>		<b>7.70</b>		<b>\$ 2,721.50</b>

**CANTEY HANGER LLP**

Client: MEY19  
Matter: 117698

October 9, 2023  
Invoice: 1509695

**EXPENSE CHARGES**

<b>Date</b>	<b>Description</b>	<b>Amount</b>
9/26/23	FALCON DOCUMENT SOLU Check # - 000348849 Subpoena Fees ATTEMPTED PROCESS SERVICE	274.22

**TOTAL EXPENSE CHARGES** **\$ 274.22**

**INVOICE TOTAL** **\$ 2,995.72**



CANTEY HANGER LLP

ATTORNEYS

600 West 6th Street, Suite 300  
Fort Worth, Texas 76102-3685

817.877.2800  
FAX 817.877.2807  
FEI 75-0756050

November 20, 2023

Meyer, Unkovic & Scott LLP  
Attn: David G. Oberdick  
Henry W. Oliver Building  
535 Smithfield St., Suite 1300  
Pittsburg, PA 15222-2315

Invoice: 1512108  
Client: MEY19  
Matter: 117698  
Billing Attorney: LH

---

## INVOICE SUMMARY

**RE: Elite Casino Events, LLC**

For professional services rendered as shown below. Unless indicated, this is an interim billing and does not include work on other matters.

Payment is due upon receipt of this invoice. Please disregard "past due" amount if you have sent your payment.

Thank you for allowing us to represent you.

Professional Fees	\$ 1,529.50
Expense Charges	<u>\$ .00</u>
<b>INVOICE TOTAL</b>	<b>\$ 1,529.50</b>
Prior Balance*	<u>\$ 995.72</u>
<b>TOTAL BALANCE DUE</b>	<b><u><u>\$ 2,525.22</u></u></b>

\*See final page of this invoice for prior balance detail by invoice.



CANTEY HANGER LLP

ATTORNEYS

600 West 6th Street, Suite 300  
Fort Worth, Texas 76102-3655

FEI 75-0756050

November 20, 2023

Meyer, Unkovic & Scott LLP  
Attn: David G. Oberdick  
Henry W. Oliver Building  
535 Smithfield St., Suite 1300  
Pittsburg, PA 15222-2315

Invoice: 1512108  
Client: MEY19  
Matter: 117698  
Billing Attorney: LH

---

## REMITTANCE

RE: Elite Casino Events, LLC

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BALANCE DUE THIS INVOICE	\$ 1,529.50
Prior Balance	<u>\$ 995.72</u>
TOTAL BALANCE DUE	<u><u>\$ 2,525.22</u></u>

---

**Please return this page with check payable to Cantey Hanger LLP at the above address. Other payment options below.**

**Wire Transfer Instructions:**

Account Name: Cantey Hanger Operating Account  
Account Number: 31009182  
ABA Number (Routing): 111014325  
Bank: Bank of Texas  
600 Penn Street  
Fort Worth, TX 76102  
Swift Number: BAKUS44

Please provide invoice information to assist us in determining the proper application of the wire

**Credit Card Instructions:**

Click here: [Pay Now](#)

OR

Visit our website:  
[www.canteyhanger.com/online-payments](http://www.canteyhanger.com/online-payments)  
Click: Cantey Hanger LLP Invoices

Please complete the form including invoice information provided on this statement



**CANTEY HANGER** LLP  
ATTORNEYS

600 West 6th Street, Suite 300  
Fort Worth, Texas 76102-3685

817.877.2800  
FAX 817.877.2807  
FEI 75-0756050

November 20, 2023

Meyer, Unkovic & Scott LLP  
Attn: David G. Oberdick  
Henry W. Oliver Building  
535 Smithfield St., Suite 1300  
Pittsburg, PA 15222-2315

Invoice: 1512108  
Client: MEY19  
Matter: 117698  
Billing Attorney: LH

## INVOICE

**RE: Elite Casino Events, LLC**  
**Cause No. 2:23-cv-1281 in Western**  
**District of Pennsylvania**

### PROFESSIONAL SERVICES

Date	Atty	Description	Hours	Amount
10/02/23	LH	Confer with process server regarding update; draft email to client regarding same and seeking Order on Motion for Substitute Service so that we may serve same in substitute manner; study email from client providing update on their filing of the Motion (last week); study email from client requesting that we have process server check to see if there is another potential personal address; study email from client transmitting screenshot of email ordering alternative service and seeking to confer by phone tomorrow; confer with process server regarding same.	.50	237.50
10/02/23	JKS	Email to Laura Hallmon regarding status of Rule 106 and client's requested service by date.	.10	21.50
10/02/23	JKS	Emails from and to Laura Hallmon regarding status of Rule 106 and potential address for service for Sean Davidson. Pull and forward same.	.20	43.00
10/03/23	LH	Confer by email with client to set call for today; confer by phone with client.	.30	142.50
10/03/23	KKH	Conferences with L Hallmon and Roy Russell re service on Elite Casino Events	.60	180.00
10/04/23	LH	Confer with process server regarding posting the citation at the home address of E. Davidson; draft email to client seeking copy of the Court's Order permitting substitute service; study email from client transmitting same and forward to process server.	.30	142.50
10/04/23	KKH	Multiple emails with Laura Hallmon and process server re court's order authorizing substituted service and coordination of same	.40	120.00

## CANTEY HANGER LLP

Client: MEY19  
Matter: 117698

November 20, 2023  
Invoice: 1512108

Date	Atty	Description	Hours	Amount
10/06/23	LH	Study email from process server confirming service by posting on door yesterday evening; draft email to client forwarding same; study email from client seeking copy of return/affidavit of service; draft email in reply.	.30	142.50
10/10/23	LH	Study return of service on E. Davidson; forward same to client.	.30	142.50
10/10/23	LH	Study email from client seeking status of affidavit of service; confer with process server regarding same; study email from process server advising of his delay in delivering affidavit, but his plans to do so this afternoon; draft email to client advising of same; study affidavit of service provided by process server; transmit same to client via email.	.50	237.50
10/10/23	KKH	Call with Roy Russell re service; Draft language for affidavit to demonstrate service in compliance with court's order re alternative service	.40	120.00
10/12/23	LH	Study email from client requesting application of retainer to the invoice for September; draft email in reply; draft email to Accounting to notify of same.	.30	N/C
10/26/23	LH	Study email from client seeking whether new invoice will be issued to address the application of the retainer and stating his preference for same; draft email in reply advising that we cannot run mid-cycle invoices but that his next invoice at the close of the current billing cycle will reflect same.	.30	N/C
10/26/23	LH	Study email from client seeking an invoice of all services rendered through present date, for filing a motion with the Court next week; confer process server seeking invoice to include with same.	.20	N/C
10/27/23	LH	Confer by email with client regarding his need for pre-bill for October's time by October 30, 2023; request same of Accounting.	.20	N/C
10/30/23	LH	Study email from process server regarding status of invoice; draft email in reply advising that we need it today if at all possible; transmit pre-bill to client per his request and advise on status of invoice from second process server.	.30	N/C
10/31/23	LH	Read email from process server transmitting invoice; forward same to client for payment.	.10	N/C
<b>TOTAL PROFESSIONAL HOURS/FEEES</b>			<b>5.30</b>	<b>\$ 1,529.50</b>

# CANTEY HANGER LLP

Client: MEY19  
Matter: 117698

November 20, 2023  
Invoice: 1512108

## SUMMARY OF PROFESSIONAL SERVICES

Attorney	Staff Level	Hours	Rate	Amount
Hancock, Kate	Associate	1.40	300.00	420.00
Hallmon, Laura	Partner	2.20	475.00	1,045.00
Sherman, Julie K.	Paralegal	.30	215.00	64.50
<b>Total</b>		<b>3.90</b>		<b>\$ 1,529.50</b>

INVOICE TOTAL

**\$ 1,529.50**

# CANTEY HANGER LLP

Client: MEY19  
Matter: 117698

November 20, 2023  
Invoice: 1512108

## OUTSTANDING INVOICES

Prior Balance	\$ 995.72
CURRENT INVOICE TOTAL	\$ 1,529.50
<b>TOTAL BALANCE DUE</b>	<b><u>\$ 2,525.22</u></b>

## AGED ACCOUNTS RECEIVABLE

Current - 30	31 - 60	61 - 90	91 - 120	Over 120	Total
\$ .00	\$ 995.72	\$ .00	\$ .00	\$ .00	\$ 995.72



# Exhibit C

**R.W. RUSSELL, INDIVIDUALLY  
DBA REICHLING ASSOCIATES**

TEXAS CERTIFIED PRIVATE PROCESS SERVER  
313 NORTH BAILEY AVENUE  
FORT WORTH, TEXAS 76107.1001  
OFFICE: 817.875.4356  
Email: [reichlingassociates@outlook.com](mailto:reichlingassociates@outlook.com)  
LinkedIn: [www.linkedin.com/roy-w-russell](http://www.linkedin.com/roy-w-russell)

TEAM MEMBERS:  
R. W. RUSSELL-TXPSC #1825  
W.D. MARKS-TXPSC #22357  
M. RODRIGUEZ-TXPSC #22548

October 30, 2023

Ms. Kate Hancock, Attorney  
Cantey Hanger, LLP  
600 West 6<sup>th</sup> Street, Suite 300  
Fort Worth, Texas 76102

**PAYABLE UPON RECEIPT**

Reference: ELITE CASINO EVENTS LLC v. ELITE CASINO EVENTS LLC-SEAN MICHAEL DAVIDISON-ELAINE DAVISON CEO  
Cause Number: 2:23-cv-1281  
Our File Number: HANCOCK-2023-INVOICE-ELITE CASINO EVENTS LLC v. ELITE CASINO EVENTS LLC

Date	Fee	Description of service
09.27.23	NOTATION	RECEIVED SUMMONS AND COMPLAINT TO BE SERVED ON BOTH; ELITE CASINO EVENTS LLC BY SERVING SEAN MICHAEL DAVIDSON AND ELAINE DAVIDSON AKA ELAINE CLARK GIBSON. SERVICE REQUESTED ON 28 SEPTEMBER 2023 BETWEEN 1400HRS-1500HRS: CHAMPION X MANUFACTURING FACILITY-901 N CROWLEY ROAD-CROWLEY -TARRANT COUNTY TEXAS 76036.

09.28.23	\$0510.00	1346hrs-1743hrs-Service attempted and <b>not completed</b> -primary address-901 NORTH CROWLEY ROAD-CROWLEY-TARRANT COUNTY TEXAS 76036.
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Upon arrival, met with security personnel and access to property was not authorized.

Security verified that there **was no Reservations or Listing** for SEAN MICHAEL DAVIDSON or ELAINE DAVIDSON AKA ELAINE CLARK GIBSON.

1548hrs-1755hrs-Service attempted and **not completed** at the secondary address-1913 WINDMILL LANE-DESOTO-DALLAS COUNTY TEXAS 75115

- Residence appears unoccupied.
- Packages left on front porch by delivery addressed to ELAINE DAVIDSON.

Returned to Fort Worth office.

Time started: 1300hrs      Time finished: 1900hrs  
6 hours at \$85.00 per hour.

Subtotal: \$0510.00

09.30.23	\$0340.00	0755hrs-1015hrs-Service attempted and not completed. Packages still located on front porch. Front door shows no evidence entry to residence. Driveway gate still open. Returned to Fort Worth. Time started: 0700hrs      Time finished: 1100hrs 4hrs at \$85.00 per hour.
10.05.23	\$0212.50	1825hrs-Service completed on ELAINE DAVIDSON, CEO OF DEFENDANT AND SEAN MICHAEL DAVIDSON per ORDER OF THE COURT by attaching both CITATIONS to front door on residence located at the address of 1913 WINDMILL LANE-DESO TO-DALLAS COUNTY TEXAS 75115. Returned to Fort Worth office. Time started: 1700hrs      Time finished: 1930hrs 2.5 hours at \$85.00 per hour.
Subtotal:	\$1062.50	
Expenses:	NA	
Mileage:	\$0195.85	(299 miles x .655 per mile) IRS 2023
Grand Total:	\$1258.35	

	09.28.23	104 miles
	09.30.23	109 miles
	10.05.23	086miles

# Exhibit D

ICANN | LOOKUP (/en)

## Registration data lookup tool

Enter a domain name or an Internet number  
resource (IP Network or ASN)

[Frequently Asked Questions](#)  
(FAQ) [\(/en/faq\)](#)

elitecasinoevent.com

Lookup

By submitting any personal data, I acknowledge and agree that the personal data submitted by me will be processed in accordance with the ICANN [Privacy Policy](https://www.icann.org/privacy/policy) (<https://www.icann.org/privacy/policy>), and agree to abide by the website [Terms of Service](https://www.icann.org/privacy/tos) (<https://www.icann.org/privacy/tos>) and the [registration data lookup tool Terms of Use](#) ([unsafe:javascript:void\(0\)](#)).

### Domain Information

**Name:** ELITECASINOEVENT.COM

**Registry Domain ID:** 1793353292\_DOMAIN\_COM-VRSN

**Domain Status:**

[clientDeleteProhibited](https://icann.org/epp#clientDeleteProhibited) (<https://icann.org/epp#clientDeleteProhibited>)

[clientRenewProhibited](https://icann.org/epp#clientRenewProhibited) (<https://icann.org/epp#clientRenewProhibited>)

[clientTransferProhibited](https://icann.org/epp#clientTransferProhibited) (<https://icann.org/epp#clientTransferProhibited>)

[clientUpdateProhibited](https://icann.org/epp#clientUpdateProhibited) (<https://icann.org/epp#clientUpdateProhibited>)

**Nameservers:**

NS1.HOSTINGBYMAGIK.COM

NS2.HOSTINGBYMAGIK.COM

### Dates

**Registry Expiration:** 2029-04-12 19:22:28 UTC

**Updated:** 2023-06-22 03:01:03 UTC

**Created:** 2013-04-12 19:22:28 UTC

### Contact Information

## Registrant:

**Handle:** 1

**Name:** Registration Private

**Organization:** Domains By Proxy, LLC

**Kind:** individual

**Mailing Address:** DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

**Contact Uri:** <https://www.godaddy.com/whois/results.aspx?domain=ELITECASINOEVENT.COM> (<https://www.godaddy.com/whois/results.aspx?domain=ELITECASINOEVENT.COM>)

## Administrative:

**Handle:** 2

**Name:** Registration Private

**Organization:** Domains By Proxy, LLC

**Kind:** individual

**Mailing Address:** DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

**Contact Uri:** <https://www.godaddy.com/whois/results.aspx?domain=ELITECASINOEVENT.COM> (<https://www.godaddy.com/whois/results.aspx?domain=ELITECASINOEVENT.COM>)

## Technical:

**Handle:** 3

**Name:** Registration Private

**Organization:** Domains By Proxy, LLC

**Kind:** individual

**Mailing Address:** DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

**Contact Uri:** <https://www.godaddy.com/whois/results.aspx?domain=ELITECASINOEVENT.COM> (<https://www.godaddy.com/whois/results.aspx?domain=ELITECASINOEVENT.COM>)

## Billing:

**Handle:** 4

Name: Registration Private

Organization: Domains By Proxy, LLC

Kind: individual

Mailing Address: DomainsByProxy.com 2155 E Warner Rd, Tempe, Arizona, 85284, US

Contact Uri: <https://www.godaddy.com/whois/results.aspx?domain=ELITECASINOEVENT.COM> (<https://www.godaddy.com/whois/results.aspx?domain=ELITECASINOEVENT.COM>)

## Registrar Information

Name: GoDaddy.com, LLC

IANA ID: 146

Abuse contact phone: tel:480-624-2505

## DNSSEC Information

Delegation Signed: Unsigned

## Authoritative Servers

Registry Server URL: <https://rdap.verisign.com/com/v1/domain/elitecasinoevent.com> (<https://rdap.verisign.com/com/v1/domain/elitecasinoevent.com>)

Last updated from Registry RDAP DB: 2023-11-27 11:46:20 UTC

Registrar Server URL: <https://rdap.godaddy.com/v1/domain/ELITECASINOEVENT.COM> (<https://rdap.godaddy.com/v1/domain/ELITECASINOEVENT.COM>)

Last updated from Registrar RDAP DB: 2023-11-27 11:46:43 UTC

## Notices and Remarks

### Notices:

#### Status Codes

For more information on Whois status codes, please visit <https://www.icann.org/epp>

For more information on domain status codes, please visit <https://icann.org/epp>

<https://icann.org/epp> (<https://icann.org/epp>)

URL of the ICANN RDDS Inaccuracy Complaint Form: <https://www.icann.org/wicf>

<https://www.icann.org/wicf> (<https://www.icann.org/wicf>).

### Terms of Use

By submitting an inquiry, you agree to these Universal Terms of Service and limitations of warranty. In particular, you agree not to use this data to allow, enable, or otherwise make possible, dissemination or collection of this data, in part or in its entirety, for any purpose, such as the transmission of unsolicited advertising and solicitations of any kind, including spam. You further agree not to use this data to enable high volume, automated or robotic electronic processes designed to collect or compile this data for any purpose, including mining this data for your own personal or commercial purposes, or use this data in any way that violates applicable laws and regulations.

<https://www.godaddy.com/agreements/showdoc?pageid=5403> (<https://www.godaddy.com/agreements/showdoc?pageid=5403>).



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Twitter (<https://www.twitter.com/icann>)



Linkedin (<https://www.linkedin.com/company/icann>)



Flickr (<https://www.flickr.com/photos/icann>)



Facebook (<https://www.facebook.com/icannorg>)



Newletters (<https://www.icann.org/resources/pages/global-newsletter-2018>)



Community Wiki (<https://community.icann.org/>)



ICANN Blog (<https://www.icann.org/news/blog>)

**WHO WE ARE CONTACT US ACCOUNTABILITY AND GOVERNANCE HELP DATA PROTECTION  
TRANSPARENCY**

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(<https://www.icann.org/privacy/policy>) Terms of Service (<https://www.icann.org/privacy/tos>)  
Cookies Policy (<https://www.icann.org/privacy/cookies>)